

REMARKS/ARGUMENTS

Favorable reconsideration of this application, in view of the above amendments and in light of the following remarks and discussion, is respectfully requested.

Claims 5-9 and 14-15 are pending in this application. By this amendment, Claims 5, 8 and 9 are amended. No new matter is added.

The Office Action rejects Claims 5-9 and 14-15 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No 6,690,357 to Dunton et al. in view of U.S. Patent No. 5,214,414 to Levine et al. This rejection is respectfully traversed.

None of the applied art teaches, discloses or suggests a control unit that generates a predetermined recognizable movement direction image picture in advance for making a user visualize the recognizable movement direction and displaying it on a predetermined display unit, and a transformation unit configured to transform the movement trail recognized by the movement trail recognizing unit to correspond with the displayed predetermined recognizable movement direction, as claimed in Claim 5 and similarly claimed in Claims 8 and 9.

Dunton et al. is directed to an electronic device that receives inputs using images of input devices and using sensors to detect the interaction of the user with those images. For example, when a user positions hands over an image as the user would using an input device, the sensors capture the movement of the user's hands and convert this movement into input command signals. That is, movements of the user's hands over the surface upon which for example a mouse image 34b was projected, can be converted into pointer positions signals for moving the position of the pointer on the display 18. Similarly, typing movements of the user's hands over the surface upon which the keyboard image 34a was projected, may cause the corresponding textual input to be entered and appear on the display 18. Thus, electromechanical input devices may be eliminated.

The Office Action admits that Dunton et al. is silent about displaying a predetermined recognizable movement direction image picture in advance for making a user visualize the recognizable movement direction. However, the Office Action asserts that Levine et al. makes up for this deficiency. Levine et al. discloses a visual trail 12b behind a moving cursor 12a so that a cursor does not disappear from the LCD 12 during rapid cursor movement. Further, Levine et al. teaches extrapolating one or more future cursor locations 12c from the present location and prematurely biases pixel locations at the extrapolated future locations.

Accordingly, there is no teaching, disclosure or suggestion for generating a predetermined recognizable movement direction image picture in advance for making a user visualize the recognizable movement direction and displaying it on the predetermined display unit and a transformation unit, configured to transform the movement trail recognized by the movement trail recognizing unit to correspond with the displayed predetermined recognizable movement direction.

Specifically, the Office Action asserts that Dunton et al. teaches a transformation unit for transforming the movement trail recognized by the movement trail recognizing unit to correspond with the recognizable movement direction since the device controls the user's cursor moving trail to correspond to the detected moving trail of the user's hand. However, the Office Action also admits that Dunton et al. is silent in displaying a predetermined recognizable movement direction image picture in advance for making a user visualize the recognizable movement direction. Accordingly, Dunton et al. cannot be silent in teaching a displaying of a predetermined recognizable movement direction image picture in advance and also teach the transformation unit which transforms the movement trail recognized by the movement trail recognizing unit to correspond with the displayed predetermined recognized movement direction. Levine et al. does not make up for the deficiencies of Dunton et al. discussed above and admitted to by the Office Action.

Assuming *arguendo* that the features discussed above in the independent claims are taught by the applied art, there is no motivation to combine the teachings of the applied art to arrive at the claimed invention. Again, Dunton et al. is directed to using scanning sensors to capture the movement of the user's hands when the user's hands are over in an image as the user would in using a physical input device to convert the movement into input command signals. On the other hand, exemplary embodiments of the present invention recognize that in fact, it is possible to generate and display a predetermined recognizable movement direction image picture in advance and display it on a predetermined display unit and a transformation unit that transforms the movement trail to correspond with the displayed predetermined recognizable movement direction. However, Dunton et al. provides no teaching, disclosure or suggestion for how one of ordinary skill in the art would perform such features. Further, there is no motivation for one of ordinary skill in the art to modify Dunton et al. to perform generating a predetermined recognizable movement direction in advance for making a user visualize the recognizable movement direction and displaying it on a display unit, and a transformation unit to transform the movement trail to correspond with the displayed predetermined recognizable movement direction. That is, one of ordinary skill in the art would have no ability to identify how to perform the features discussed above given the disclosure in Dunton et al.

Accordingly, Applicants respectfully submit that only the present application suggests the claimed combination of features. As such, the asserted combination of Dunton et al. and Levine et al. was made using improper hindsight reconstruction of the references. Consequently, it is respectfully submitted that Claims 5-9 and 14-15 patentably define over the asserted prior art.

Consequently, in view of the present amendment and in light of the foregoing comments, it is respectfully submitted that the invention defined by Claims 5-9 and 14-15 is

Application No. 09/838,644  
Reply to Office Action of October 18, 2005

patentably distinguishing over the applied art. The present application is therefore believed to be in condition for formal allowance and an early and favorable reconsideration of this application as presently amended is respectfully requested.

Respectfully submitted,

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